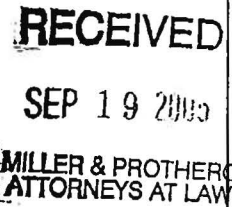
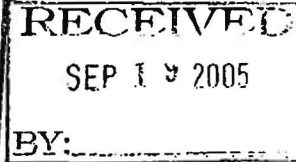
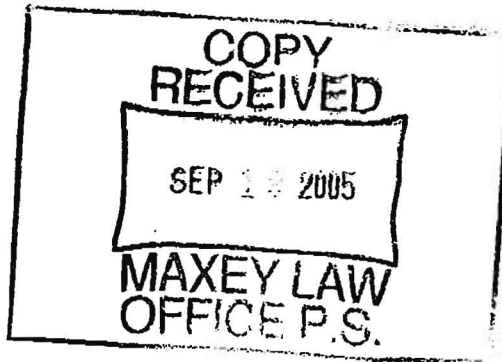


***Exhibit L***



**FILED**

**SEP 19 2005**

THOMAS R. FALLQUIST  
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SPOKANE**

AIMEY MERIE VIGUE, a single person; )  
ROBERT SCOTT VIGUE and KAY )  
VIGUE, husband and wife, )  
  
Plaintiffs, )  
  
vs. )  
  
EDWARD NORMAN DAVIS and )  
CHERYLE RUSTAD, husband and wife and )  
marital community thereof; )  
WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC.; WATCH )  
TOWER BIBLE AND TRACT SOCIETY )  
OF PENNSYLVANIA; CHRISTIAN )  
CONGREGATION OF JEHOVAH'S )  
WITNESSES; OPPORTUNITY )  
CONGREGATION OF JEHOVAH'S )  
WITNESSES, )  
  
Defendants. )

No. 04-2-02451-4

**DISCLOSURE OF LAY AND  
EXPERT WITNESSES  
[CHURCH DEFENDANTS]**

COMES NOW the defendants WATCHTOWER BIBLE AND TRACT SOCIETY  
OF NEW YORK, INC., CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES,  
and OPPORTUNITY CONGREGATION OF JEHOVAH'S WITNESSES (hereinafter

DISCLOSURE OF LAY AND EXPERT  
WITNESSES [CHURCH DEFENDANTS] - 1

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000

1 “Church Defendants”), by and through their attorneys Paine, Hamblen, Coffin, Brooke &  
2 Miller LLP, and Donald G. Stone, who pursuant to this Court’s revised scheduling order,  
3 provide the following disclosure of lay and expert witnesses:  
4

5 **Lay Witnesses:**

- 6 1. Aimey Merie Vigue
- 7 2. Robert Scott Vigue
- 8 3. Kay Vigue
- 9 4. Kathy Avery
- 10 5. Ronald Bain
- 11 6. Michael Basford
- 12 7. Kevin Bechtold
- 13 8. Aaron Blanchard
- 14 9. Colleen Davis (formerly Gilbert)
- 15 10. Edward N. Davis
- 16 11. Pauline Davis (formerly Gilbert)
- 17 12. Mike Gilbert
- 18 13. Cheryle Rustad Guernsey (formerly Davis)
- 19 14. Ken Harding
- 20 15. Ronald Jilge
- 21 16. Angie Kilmer
- 22 17. Pat Kilmer
- 23 18. Ryan Learn

28  
29 DISCLOSURE OF LAY AND EXPERT  
30 WITNESSES [CHURCH DEFENDANTS] - 2

*PAINE, HAMBLEN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000*

- 1 19. Tom Lorenzen
- 2 20. Mr. Nigles
- 3 21. Mike Norman
- 4 22. Ary Spoelstra
- 5 23. Phil Vigue
- 6 24. Richard Zink
- 7 25. Records Custodian: Spokane County Prosecutor's Office
- 8 26. Washington Service Desk, Watchtower Bible and Tract Society of New
- 9 York, Inc.
- 10 27. Washington Service Desk, Christian Congregation of Jehovah's Witnesses,
- 11 Inc.
- 12 28. Corporate Designate, Watch Tower Bible and Tract Society of
- 13 Pennsylvania, Inc., if not dismissed prior to trial.
- 14
- 15

16 **Potential Expert Witnesses:**

- 17 1. Ronald M. Klein, Ph.D. (Psychologist)
- 18 Behavioral Medicine Services
- 19 P.O. Box 30598
- 20 601 W. Main, Suite 1011
- 21 Spokane, WA 99223-3009
- 22 2. Jeffrey N. Younggren, Ph.D. (Psychologist)
- 23 827 Deep Valley Drive, Suite 309
- 24 Rolling Hills Estates, CA 90274
- 25 3. Gary Breaux (Elder of Jehovah's Witnesses)
- 26 2821 Route 22
- 27 Patterson, NY 12563
- 28 4. These defendants specifically reserve the right to call an economist and/or
- 29 vocational therapist to the extent that plaintiffs assert any lost income
- 30 claims.

DISCLOSURE OF LAY AND EXPERT  
WITNESSES [CHURCH DEFENDANTS] - 3


*PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP*  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000

1  
2 The aforementioned witnesses may testify to subjects set forth in their previous  
3 declarations or affidavits, if any, or other documents disclosed in discovery, and the  
4 pleadings in this matter. The description of testimony is not intended to limit the testimony  
5 and opinion may be offered consistent with ER 701, 702, 703, 704, and 705.  
6

7 These defendants further reserve the right to call any witnesses identified by  
8 plaintiffs or other defendants. These defendants further reserve the right to identify and call  
9 witnesses as may be identified incidental to discovery herein.  
10

11 DATED this 19<sup>th</sup> day of September, 2005.  
12

13 PAINE, HAMBLIN, COFFIN,  
14 BROOKE & MILLER LLP  
15

16 By:   
17 Donald G. Stone, WSBA #7547  
18 Devra Sigle-Hermosilla, WSBA #31169  
19 Attorneys for CHURCH DEFENDANTS  
20  
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27

28 DISCLOSURE OF LAY AND EXPERT  
29 WITNESSES [CHURCH DEFENDANTS] - 4  
30

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 19<sup>th</sup> day of September, 2005, I caused to be served a true and correct copy of the foregoing document to the following:

David M. Miller  
MILLER & PROTHERO  
868 Paulsen Building  
421 W. Riverside Avenue  
Spokane, WA 99201

☐ U.S. MAIL  
☒ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX)

Attorneys for PLAINTIFFS

Bevan J. Maxey  
MAXEY LAW OFFICES, P.S.  
1835 West Broadway  
Spokane, WA 99201

☐ U.S. MAIL  
☒ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX)

Attorneys for DEFENDANT EDWARD  
DAVIS

Dean E. White  
Attorney at Law  
430 W. Indiana Avenue  
Spokane, WA 99205

☐ U.S. MAIL  
☒ HAND DELIVERED  
☐ OVERNIGHT MAIL  
☐ TELECOPY (FAX)

Attorneys for DEFENDANT CHERYLE  
RUSTAD



Donald G. Stone  
Devra Sigle-Hermosilla

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DISCLOSURE OF LAY AND EXPERT  
WITNESSES [CHURCH DEFENDANTS] - 5

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000